

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED,

Defendant.

Case No. 2:23-cv-00449-JRG

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR ENTRY OF STIPULATED SUPPLEMENTAL
PROTECTIVE ORDER FOR NON-PARTY NVIDIA CORPORATION**

Plaintiff Universal Connectivity Technologies Inc. (“UCT”) respectfully submits the attached proposed stipulated supplemental Protective Order for non-party NVIDIA Corporation, for the Court’s consideration and approval. Non-party NVIDIA Corporation has requested the supplemental protective order for its production in response to UCT’s subpoena. Defendant Lenovo Group Limited (“LGL”) does not oppose this motion.

Dated: December 16, 2024

Respectfully submitted,

/s/ Brett E. Cooper

Brett E. Cooper (NY SBN 4011011)

bcooper@bc-lawgroup.com

Seth Hasenour (TX SBN 24059910)

shasenour@bc-lawgroup.com

Jonathan Yim (TX SBN 24066317)

jyim@bc-lawgroup.com

Drew B. Hollander (NY SBN 5378096)

dhollander@bc-lawgroup.com

BC LAW GROUP, P.C.
200 Madison Avenue, 24th Floor
New York, NY 10016
Phone: 212-951-0100

*Attorneys for Plaintiff Universal Connectivity
Technologies Inc.*

CERTIFICATE OF SERVICE

The undersigned certifies that on December 16, 2024 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Brett Cooper
Brett Cooper

CERTIFICATE OF CONFERENCE

The Parties have complied with the meet and confer requirement and the motion is submitted as unopposed.

/s/ Brett Cooper
Brett Cooper